

800 Response Information Services LLC

Ex Parte Filing

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: CC Docket No. 95-155 Toll Free Service Access Codes;
CC Docket No. 96-115 Telecommunications Carrier's Use Of Customer Proprietary Network
Information And Other Customer Information
CC Docket No. 17-192 Toll Free Assignment Modernization

Dear Ms. Dortch:

On April 4, 2019, at the request of Heather Hendrickson, the undersigned of 800 Response and Bruno Tabbi of Ignition Toll Free met (via telephonic bridge) with the following members of the Wireline Competition Bureau:

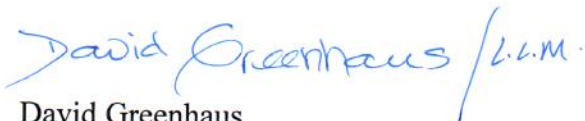
- Kris Monteith, Bureau Chief
- Ann Stevens, Deputy Division Chief
- Heather Hendrickson, Assistant Division Chief
- Alex Espinoza, Attorney Advisor
- Matt Collins, Attorney Advisor
- Justin Faulb, Legal Advisor

The purpose of the teleconference was to provide a general background on the geographic routing of toll free numbers, to provide information about privacy protections inherent in process of routing toll free calls according to the geographic location of the caller, and current impediments to the timely and accurate geographic routing of toll free calls and the nature and source of those impediments.

We also suggested that the ability to timely and accurately route toll free calls would have a significant impact on the valuation of numbers auctioned from the 833 NPA. The ability to share individual numbers among a group of independent customers or to terminate such numbers to many franchisees based upon closest location expands the resource, tailors service to callers seeking to connect with the closest business and allows many businesses access to quality vanity toll free numbers. These factors support a viable business case for potential purchasers of 833 numbers, resulting in a significantly greater value for each number.

If the Commission were able to provide assurances to the mobile phone and other originating carriers that the both have the obligation to provide "fuzzy location information to toll free service providers and that in doing so they would not be in conflict with privacy protections due to customers, then toll free service providers would be free to offer geographic routing and Shared Use services to customers with no undue call delay or latency or unnecessary caller interference. In the case of these services "opt in" or "opt out" is not just unnecessary, but also presents a hindrance and possible safety issue to callers, especially those that are operating motor vehicles.

Sincerely,

Handwritten signature of David Greenhaus in blue ink, followed by the initials "L.L.M." in a smaller, slanted font.

David Greenhaus

cc (via email):

Kris Monteith
Ann Stevens
Heather Hendrickson
Alex Espinoza
Matt Collins
Justin Faulb